



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

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April 14, 2011

Ms. Jamie Bernard-Drakey
SUPR/ER&R
U.S. EPA, Region VII
901 North 5th Street
Kansas City, KS 66101

Re: St. Louis FMGP #2 Site, Convent and South Second Streets, St. Louis, Missouri

Dear Ms. Bernard-Drakey:

The Missouri Department of Natural Resources (MDNR), Hazardous Waste Program's (HWP's), Site Assessment Unit (SAU) has completed a Site Inspection/Removal Site Evaluation (SI/RSE) investigation at the above referenced site. An Expanded Site Inspection (ESI) is recommended to fully evaluate human health and environmental risks posed by the site. The SI/RSE report is enclosed in hard copy and electronic formats. A brief summary of the findings and recommendations for the site are included below.

The St. Louis FMGP #2 site, also known as Laclede Station A and St. Louis FMGP #6, is the location of a former manufactured gas plant (FMGP) operated by Laclede Gas and Light Company from the late 1800s to late 1950s. The U.S. Environmental Protection Agency (EPA) completed a Preliminary Assessment of the site on October 19, 1989.

In 2008, the site was referred to the MDNR, HWP, Superfund Section's SAU by the MDNR, HWP, Brownfields and Voluntary Cleanup Program (BVCP) for further investigation. The referral was made after volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and petroleum hydrocarbons were documented in subsurface soil and groundwater of the Wharf Street Property located east of the site. These contaminants are suspected to have migrated from the St. Louis FMGP #2 site. The SAU initiated a SI investigation of the St. Louis FMGP #2 site on July 30, 2008 and integrated the RSE on May 28, 2009. The investigation included a site visit on December 2, 2008; and sampling events on June 21-24, 2010, and December 15, 2010.

The St. Louis FMGP #2 site is located in a commercial-industrial area of St. Louis about 1,000 feet west of the Mississippi River. The site remains commercial-industrial use, but is currently divided into two north and south properties with separate ownership. Currently, the north property of the site is owned by Second Street Investments, LLC. and used as a United States Postal Service trailer parking lot and separate vacant portion used for storage of boulders and



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construction rock. The south property is owned by T. P. Investments Inc. and is actively used by TRI-Rinse, Inc., an environmental contractor company, for business and commercial operations. Approximately 50 people work in TRI-Rinse's warehouse and office building.

Four domestic and seven industrial wells are recorded within a four-mile radius of the site. There are no public wells within four miles of the site. The nearest domestic well lies approximately 0.95 mile north of the site. At least an estimated 10 people use groundwater from within four miles of the site for drinking water purposes. Much of St. Louis is served by the St. Louis City public water intake located approximately 11 miles upstream of the site on the Mississippi River. During the SI/RSE sampling events, stained soil, black slurry and oily liquids were encountered in the subsurface. The physical characteristics and laboratory analysis of groundwater samples collected across the site document the release of VOCs, SVOCs and TPHs to groundwater beneath the site. Benzene and PAHs were measured at concentrations exceeding health and environmental benchmarks.

The Mississippi River flows southward approximately 1,000 feet east of the St. Louis FMGP #2 site which lies in the Mississippi River flood plain. It is likely that the Mississippi River receives a groundwater component from surrounding areas including the St. Louis FMGP #2 site. There are no drinking water intakes along surface waters within 15 miles downstream of the site. Listed species or critical habitats within one mile of the site are limited to those species living in the Mississippi River.

The site is capped with asphalt, buildings and gravel, and access is mostly restricted by fencing and gates. Based on the physical characteristics, some of the material found in the subsurface is suspected to be tar product. Laboratory analysis of sub-surface soil samples collected from the site document the release of hazardous materials cyanide, lead, VOCs, SVOCs and TPHs at the site. Benzene and PAHs exceeded health and environmental benchmarks. Due to the cap on the site, exposure to contaminated soils is mainly restricted to excavation and construction activities.

There appears to be a potential for subsurface vapor intrusion into current and/or future constructed buildings on the site. BTEX components were detected in soil gas wells installed around the TRI-Rinse building. None of the soil gas detections exceeded the Missouri Risk-Based Corrective Action target levels for indoor inhalation of vapor emissions. However, benzene, ethylbenzene and toluene exceeded the corresponding EPA indoor air targets for a cancer risk of 10^{-5} . Analysis of indoor air samples collected by TRI-Rinse from within the facility reported benzene above the EPA screening level.

Further investigation is recommended to assess the extent of off-site migration of contamination from the site; determine whether there has been a release of hazardous substances to the Mississippi River; and fully assess the vapor intrusion pathway and determine appropriate

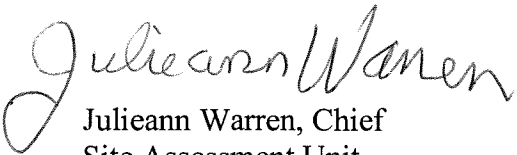
Ms. Bernard-Drakey
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mitigation procedures, if necessary. The placement of an environmental covenant with land use restrictions and/or engineering controls is also recommended for the entire site.

If you have any comments or questions please feel free to contact me in writing at the Missouri Department of Natural Resources, Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102-0176, by phone at (573) 751-1087 or toll free at 1-800-361-4827, or by e-mail at julieann.warren@dnr.mo.gov.

Sincerely,

HAZARDOUS WASTE PROGRAM

A handwritten signature in cursive script that reads "Julieann Warren". The signature is written in dark ink and is positioned to the left of the printed name and title.

Julieann Warren, Chief
Site Assessment Unit

JW:cnj

Enclosures